## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NORTH CAROLINA EASTERN DIVISION

No. 4:24-cr-00016-M

UNITED STATES OF AMERICA

v.

UNOPPOSED MOTION TO CONTINUE ARRAIGNMENT

## SINA GHOLINEJAD

Sina Gholinejad, by and through undersigned counsel, respectfully moves the Court to continue the arraignment currently set for May 9, 2025. The following is offered in support of this motion:

- 1. On April 4, 2024, Mr. Gholinejad was named in a Criminal Indictment which charged him with fraud and money laundering.
- The Office of the Federal Public Defender was appointed to represent Mr. Gholinejad on January 15, 2025. Defense counsel filed her Notice of Appearance on January 15, 2025.
- 3. Mr. Gholinejad is currently in the custody of the United States Marshals Service and is being housed in the New Hanover County Detention Center.
- On April 24, 2025, a notice of hearing was filed and set the arraignment for May 7,
   2025, in Wilmington before Chief Judge Myers.
- 5. Additional time is needed to translate court documents into Mr. Gholinejad's native language of Farsi.
- Defense counsel respectfully requests the arraignment hearing be continued to a late May 2025 date.

7. Assistant United States Attorney Bradford DeVoe has been contacted and has no

objection to the continuance requested herein.

8. This motion is made in good faith and not for purposes of delay. Neither the

government nor the Defendant would be prejudiced by the request sought herein.

9. The ends of justice served by this Motion outweigh the interests of the public and the

defendant in a speedy trial. The period of delay resulting from granting this

continuance should therefore be excluded from the calculation of speedy trial time

pursuant to 18. U.S.C. § 3161(h)(8)(A).

Mr. Gholinejad respectfully requests the arraignment in this matter be continued to a late

May 2025 date or a date that the Court deems appropriate.

Respectfully submitted this 2nd day of May 2025.

G. ALAN DuBOIS

Federal Public Defender

/s/ Diana H. Pereira

DIANA H. PEREIRA

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N.C. State Bar No. 32615

LR 57.1 Counsel Appointed

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was served upon:

BRADFORD DEVOE United States Attorney's Office - EDNC 150 Fayetteville Street, Suite 2100

Raleigh, NC 27601

by electronically filing the foregoing with the Clerk of Court on May 2, 2025, using the CM/ECF system which will send notification of such filing to the above.

This the 2nd day of May 2025.

/s/ Diana H. Pereira
DIANA H. PEREIRA
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